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November 19, 2021

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Juan Elias de Jesus v. Fordham Fulton Realty Corp. et al.
Case No. 1:20-cv-10951-AT
Request for Extension of Time to Move for a Default

Dear Judge Torres:

I am counsel for the Plaintiff in the above-caption matter.

On November 5, 2021, the Court directed that Plaintiff move for entry of default and a judgment of default by December 3, 2021. Order of Hon. Analisa Torres, Docket No. 32.

Since that date, several intervening matters have delayed the commencement of work on a default motion. Chief among these, around the time of the Court's Order, I began meeting with and preparing a Fair Labor Standards Act and New York Labor Law complaint for wage violations on behalf of thirteen initial plaintiffs and, to date seven subsequently joining FLSA plaintiffs. This involved meeting with and reviewing the employment circumstances of each of the plaintiffs as well as multiple filings with the court. As individual FLSA plaintiffs' claims may become partially time barred if not acted on immediately, this matter has required my immediate attention.

On another matter, I was required to prepare a motion for emergency relief on behalf of a client who faced immediate, dire consequences after a court error led to his default on a case. Work on that matter is ongoing.

Additionally, a flood that occurred in our offices on October 26, 2021, resulting in a mildew condition that has severely compromised the air quality in our offices, and most particularly in my personal office, forced us to cancel or reschedule most nonessential client appointments through Friday, November 12, 2021, required us to completely shut the office to the public on several days, and continues to render certain parts of the office unusable. Because of the foregoing circumstances and the intervening Thanksgiving holiday, I will not be able to meet with Mr. De Jesus until after the holiday.


For the foregoing reasons, I respectfully request that the Court grant an extension of time to file for a judgment of default through December 27, 2021.

This is the first request for the relief sought herein.

GRANTED.

SO ORDERED.

Dated: November 22, 2021
New York, New York



ANALISA TORRES
United States District Judge